

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

DARK CIRCUIT LABS, INC.,

Plaintiff,

vs.

Civil Action No.: 1:23-cv-00326-LMB-LRV

**BLACK SAILS SECURITY LLC, JOHN
CARPENTER, ERIC MISSIMER,
MICHAEL FRANK, and KEITH
HADDOCK,**

Defendants.

ERIC MISSIMER,

Plaintiff,

vs.

Civil Action No.: 1:23-cv-00476-LMB-LRV

DARK CIRCUIT LABS, INC.,

Defendant.

**DECLARATION OF STEVEN J. WEBER, ESQ. IN SUPPORT OF
DARK CIRCUIT LABS, INC.'S MOTION TO CONSOLIDATE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 42**

I, STEVEN J. WEBER, ESQ., hereby declare and state as follows:

1. I am an attorney with the law firm Peckar & Abramson, P.C., counsel for Plaintiff Dark Circuit Labs, Inc. (hereafter "DCL"), and I make this declaration in support of Plaintiff's Motion to Consolidate ("Motion") pursuant to Federal Rule of Civil Procedure 42.

2. A true and correct copy of the First Amended Verified Complaint, dated March 23, 2023, and exhibits thereto, filed by DCL, as a plaintiff, against Missimer as a defendant,

entitled, *Dark Circuit Labs, Inc. v. Black Sails Security, LLC, John Carpenter, Eric Missimer, Michael Frank, and Keith Haddock*, Civil Action No. 1:23-cv-00326-LMB-LRV, pending within the United States District Court for the Eastern District of Virginia, Alexandria Division, is attached hereto and incorporated as **Exhibit 1** ("DCL I").

3. A true and correct copy of the Complaint, dated April 7, 2023, and exhibits thereto, filed by Eric Missimer, as a plaintiff against DCL as a defendant in the Circuit Court of Virginia, Fairfax County, is attached hereto and incorporated as **Exhibit 2** ("DCL II").

4. A true and correct copy of the Notice of and Petition for Removal, dated April 11, 2023, and exhibits thereto, filed by DCL to remove *DCL II* to this Court from the Fairfax County Circuit Court, is attached hereto and incorporated as **Exhibit 3**.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 12, 2023

Respectfully submitted,



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